

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

ALBERT TRAPAGA, PRO SE,
Petitioner,

vs.

BRUCE CHADBOURNE, in his
capacity as field Office
Director of Detention for
Removal of Detainees,
Defendants., ET AL.

FILED
IN CLERKS OFFICE
2005 FEB -1 P 2:34

CIVIL ACTION OF MASS
DISTRICT COURT
NO. 1:04-cv-12599

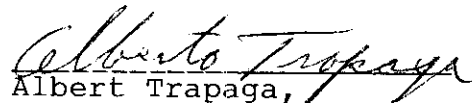
**PETITIONER'S MOTION FOR THE
APPOINTMENT OF COUNSEL**

NOW COMES the above petitioner, Alberto Trapaga,
and hereby files his self-prepared Motion Requesting
the Appointment of Counsel in the above-entitled matter.

As grounds for such motion, petitioner states that;
(a) he is indigent, and can only pay the cost of the
\$5.00 filing fee, and (b) that he is not schooled in
law and his action desperately needs the full attention
of experienced counsel, and (c) that the issues around
deportation and immigration are very complex, and it
would be a waste of valuable resources for the court
to force him to act on his own in such an important
matter and, (d) he is an illegal Alien which makes the
action more complex. Finally, the appointment of counsel
would be cost effective to both the court and the United
States.

WHEREFORE, petitioner prays that this Honorable
Court will grant his motion for all stated herein.

Respectfully submitted,



Albert Trapaga,
Mass Treatment Center
30 Administration Road
Bridgewater, MA 02324-3230
Petitioner, Pro Se

Dated: January 17, 2005